

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** ) **Case No.** 22-21412-GLT  
Kathleen T. Meinert, )  
                        **Debtor,** ) **Chapter 13**  
                        )  
Kathleen T. Meinert, )  
                        **Movant,** )  
                        **vs.** )  
PNC Bank, N.A. and Ronda J. )  
Winneccour, Chapter 13 Trustee )  
                        **Respondents.** ) **Document No.**

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGES**  
**FILED ON JANUARY 10, 2023 AND FEBRUARY 8, 2023**

**AND NOW**, come the Debtor, Kathleen T. Meinert, by and through her attorneys, Calaiaro Valencik and David Z. Valencik, and present the following Declaration regarding the Notice of Mortgage Payment Changes filed on January 10, 2023 and February 8, 2023:

1. Kathleen T. Meinert (the "Debtor") filed an emergency Chapter 13 bankruptcy on July 27, 2022, at Case No. 22-21412 GLT.
2. PNC Bank, N.A. (hereinafter "PNC") holds a home equity line of credit on the property at 128 Crystal Springs Drive, Cranberry Township, Pennsylvania 16066.
3. PNC filed Notice of Mortgage Payment Change ("NMPC") on January 10, 2023. The January 10, 2023 NMPC proposed to increase the payment to PNC by \$12.30 due to a change in the interest rate.
4. The Debtor requested and received an extension of time to respond to the NMPC. The deadline to respond to the January 10, 2023 NMPC is February 14, 2023.
5. During the extension period, PNC filed another NMPC on February 8, 2023. The February 8, 2023 NMPC proposed to further increase the payment to PNC by \$12.08.

6. The Debtor filed an amended plan on September 9, 2022.
7. The Amended Plan provides for the property at 128 Crystal Springs Drive, Cranberry Township, Pennsylvania 16066 be sold.
8. The Amended Plan provides for adequate protection payments prior to the sale.
9. Upon sale of the property, PNC will be paid from the proceeds of the sale.
10. The current plan is sufficient because it provides adequate protection prior to a sale of the property.

**Respectfully Submitted,**

**Date:** February 14, 2023

**BY:** /s/ David Z. Valencik  
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